

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**STUDENTS FOR JUSTICE IN  
PALESTINE AT PITT,**

*Plaintiff,*

**v.**

**UNIVERSITY OF PITTSBURGH; JOAN  
GABEL, MARLIN NABORS, KARIN  
ASHER, DaVAUGHN VINCENT-  
BRYAN, MATTHEW LANDY, and  
JAMEY MENTZER, all in their official  
and individual capacities,**

*Defendants.*

**CIVIL ACTION NO. 2:25-CV-00524**

**Judge J. Nicholas Ranjan**

**JOINT MOTION TO STRIKE AND SUBSTITUTE EXHIBIT**

Plaintiff Students for Justice in Palestine at Pitt and Defendants University of Pittsburgh (“Pitt” or the “University”), Joan Gabel, Marlin Nabors, Karin Asher, DaVaughn Vincent-Bryan, Matthew Landy, and Jamey Mentzer, by and through their counsel, jointly move to strike an exhibit to the Memorandum of Law in Support of Plaintiff’s Revised Motion for Preliminary Injunction, originally filed July 11, 2025. Counsel for Defendants notified SJP-Pitt that Exhibit 9,<sup>1</sup> ECF No. 46-12, contained attorney-client privileged information and was inadvertently produced. The parties conferred and agreed to substitute a version of Exhibit 9 with redactions to protect material that Defendants claim is attorney-client privileged and has no relevance to this lawsuit. See Attachment A (proposed substitution for Exhibit 9). The Parties respectfully

---

<sup>1</sup> The cover page for this exhibit previously identified it as Exhibit 10. For the Court’s convenience, the proposed substitution corrects this error.

request that this Court strike Exhibit 9, ECF No. 46-12, and substitute the proposed replacement, filed as Attachment A to this Motion.

Dated: August 14, 2025

By: /s/ Witold J. Walczak  
Witold J. Walczak  
PA Bar No. 62976  
Ali Szemanski  
PA Bar No. 327769  
ACLU OF PENNSYLVANIA  
P.O. Box 23058  
Pittsburgh, PA 15222  
P: 412-681-7864  
F: 267-573-3054  
vwalczak@aclupa.org  
aszemanski@aclupa.org

Solomon Furious Worlds  
PA Bar No. 333677  
ACLU OF PENNSYLVANIA  
P.O. Box 60173  
Philadelphia, PA 19102  
P: 215-592-1513  
F: 267-573-3054  
sfworlds@aclupa.org

Jules Lobel, Esq.  
NY Bar No. 1262732  
P.O. Box 81918  
Pittsburgh, PA 15217  
P: 412-334-1379  
juleslobel73@gmail.com

*Counsel for Plaintiff*

By: /s/ Joshua W.B. Richards  
Joshua W. B. Richards  
PA Bar No. 204315  
1500 Market Street  
Centre Square West, 38th  
Floor  
Philadelphia, PA 19102  
Phone: 215-972-7737  
Joshua.Richards@saul.com

Alexander R. Bilus  
PA Bar No. 203680  
1500 Market Street  
Centre Square West, 38th  
Floor  
Philadelphia, PA 19102  
Phone: 215-972-7177  
Alexander.Bilus@saul.com

Peter C. Nanov\*  
PA Bar No. 333397  
1919 Pennsylvania Avenue, N.W.  
Suite 550  
Washington, D.C. 20006-3434  
Peter.Nanov@saul.com

*\*admitted pro hac vice*

*Counsel for Defendants*